

Remarks

Applicants thank the Examiner for returning the signed and initialed copies of the Information Disclosure Statements (PTO 1449) filed January 23, 2001, January 30, 2003, June 18, 2003, November 5, 2003, and April 5, 2004 that were included with the Office Action.

Claims 1-20 are pending in this application. Claims 1, 5, 6, 10, 11, 15, 16, and 20 are currently amended. No claims are cancelled or newly added. No new subject matter has been added. In view of the foregoing amendment and the following remarks, allowance of all the claims pending in the application is requested.

Rejection Under 35 U.S.C. § 102

Claims 1-20 are rejected under 35 U.S.C. 102(e) as being anticipated by Goldberg et al. (U.S. Patent No. 6,434,543). Applicant traverses this rejection on the following basis.

Independent claim 1 recites, among other things, requesting at least one second connection between the server and at least one database, wherein the database includes at least one self defining entity, the self defining entity including at least one of a hierarchical data list, a hierarchical data element, and a hierarchical data container. Independent claims 6, 11, and 16 include recitations similar to this feature of claim 1, among other things.

In an exemplary embodiment, the invention provides a system and method for storing hierarchical data lists (HDLs) with the ability to navigate and read the hierarchy of an entire hierarchical data list (see specification page 4, lines 7-8 and page 3, lines 16-17). Each hierarchical data list, hierarchical data element, and/or hierarchical data container may be a self defining entity, and contain its own schema (see the specification at page 3, lines 25-27). A user may include as much information as desired into a single object hierarchical data list (see specification page 21, lines 26-27). By storing information together as a single object in a hierarchical data list, only a

single call may be needed to retrieve all the information associated with the hierarchical data list (see specification page 20, lines 22-24).

Goldberg appears to be drawn to a system in which connections that are opened between a server and one or more databases in response to user queries are stored in a connection manager so that a new query may use a previously opened connection (See Goldberg at col. 2, lines 34-46). However, Goldberg apparently is silent with respect to the data that may be stored in the one or more databases. Therefore, Goldberg does not disclose requesting at least one second connection between the server and at least one database, wherein the database includes at least one self defining entity. For at least this reason, Goldberg does not anticipate the claimed invention of claims 1, 6, 11, and 16.

Accordingly, withdrawal of the rejection of these claims is requested. Claims 2-5, 7-10, 12-15, and 17-20 depend from and add additional features to independent claims 1, 6, 11, and 16, respectively. Therefore, claims 2-5, 7-10, 12-15, and 17-20 are allowable by virtue of their dependency, as well as for the features that they add to the independent claims.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,



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